Carson City, Nevada 89703 (775) 885-1896

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Francis C. Flaherty
 1
     Nevada Bar No. 5303
     Casey A. Gillham
2
     Nevada Bar No. 11971
     Dyer, Lawrence, Flaherty,
 3
       Donaldson and Prunty
     2805 Mountain Street
 4
     Carson City, Nevada 89703
     Phone: (775) 885-1896
 5
     Facsimile: (775) 885-8728
     fflaherty@dyerlawrence.com
 6
     cgillham@dyerlawrence.com
 7
     Attorneys for Defendants Nevada State
     Education Association and Education
 8
     Support Employees Association
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     SAMANTHA A. GALING,
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     an individual:
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                   Plaintiff,
     v.
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     NEVADA STATE EDUCATION
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     ASSOCIATION a Domestic Non-
     Profit Coop. Corporation; EDUCATION
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     SUPPORT EMPLOYEES ASSOCIATION
     a Domestic Non-Profit Coop. Corporation;
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     DOES 1 through X, inclusive; ROE
     CORPORATIONS I through X, inclusive;
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                   Defendants.
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DISTRICT OF NEVADA

UNITED STATES DISTRICT COURT

Case No.: 2:16-CV-00993-APG-PAL

STIPULATION AND ORDER TO

EXTEND DISCOVERY AND DISPOSITIVE MOTION DEADLINES

(FIRST REQUEST)

Pursuant to LR 6-1, 6-2 and 26-4 and for the reasons provided below, the parties, through their respective counsel request that the Court extend the discovery and dispositive motion deadlines in this matter for the limited purpose of allowing Plaintiff to take the depositions of Brian Christensen and Gary Peck. This is the first request for an extension of the discovery and dispositive motion deadlines.

1. Discovery Completed to Date:

- A. The parties have disclosed numerous records and evidence;
- B. The parties have propounded and answered interrogatories; requests for admission; and requests for production;

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	C.	Defendants	have	taken	the	deposition	of Plaintiff
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D. The parties have produced numerous FRCP 26 disclosures.

2. Discovery that Remains to be Completed:

A. Plaintiff seeks to take the depositions of Brian Christensen and Gary Peck. Plaintiff anticipates taking the aforementioned depositions by March 24, 2017.

3. Why Discovery Was Not Completed Within the Limits Set by the Discovery Order

On January 3, 2017, Plaintiff noticed the depositions of Brian Christensen and Gary Peck, both former employees of Defendant NSEA, for January 19, 2017. Mr. Peck was not available on January 19, 2017, and the parties agreed that Mr. Peck's deposition would be rescheduled for a more convenient time after the close of discovery on January 23, 2017.

With regards to Mr. Christensen, Defendants were unable to provide Plaintiff with current contact information for Mr. Christensen until January 10, 2017. Given that Defendants had been unable to provide current contact information for Mr. Christensen until January 10, 2017, Defendants agreed to give Plaintiff additional time after the close of discovery in order to subpoena Mr. Christensen.

4. Proposed Schedule for Completing Discovery and Filing Dispositive Motions

On October 31, 2016, this Court ordered that the last date to complete discovery would be January 23, 2017, and that the last day to file dispositive motions would be February 22, 2017. The proposed schedule for completing the remaining discovery and to file dispositive motions is as follows:

Last day to complete depositions mentioned herein: March 24, 2017

Last day to file dispositive motions: April 23, 2017

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5. Certificate of Conference and Stipulation

Counsel for the parties have conferred and have signed below, indicating their agreement to this Stipulation and Order to Extend Discovery Deadlines (First Request). The parties do not request a conference with the Magistrate before entry of an Amended Scheduling Order, should one be required.

Dated this 13th day of February, 2017

Dated this 13th day of February, 2017.

/s/Trevor J. Hatfield
TREVOR J. HATFIELD, ESQ
HATFIELD & ASSOCIATES
Attorneys for Plaintiff

/s/Casey A. Gillham
CASEY A. GILLHAM, ESQ.
DYER, LAWRENCE, FLAHERTY,
DONALDSON & PRUNTY
Attorneys for Defendants

ORDER

IT IS HEREBY ORDERED, ADJUDGED and DECREED that the deadlines in this case are as follows:

Plaintiff will have until March 24, 2017, to take the depositions of Brian Christensen and Gary Peck; and

The last day to file dispositive motions will be April 23, 2017.

UNITED STATES MAGISTRATE JUDGE

DATED: February 22, 2017